

(24)
2-15-02
MA

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

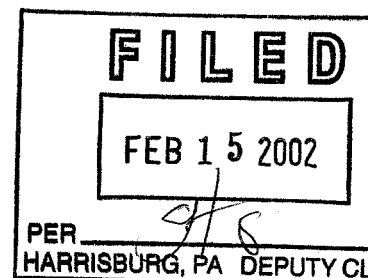
WILLIAM HAZZARD,
Plaintiff,

v.

TIM CURTIS, MACK MCMURRAY,
AFSCME DISTRICT 90, and THE
HARRISBURG SCHOOL DISTRICT,
Defendants.

No. 1:CV-00-1758

(Judge Rambo)

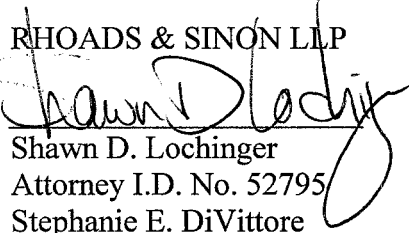


**MOTION FOR SUMMARY JUDGMENT FILED ON BEHALF OF
DEFENDANTS HARRISBURG SCHOOL DISTRICT & TIMOTHY CURTIS**

Pursuant to Federal Rule of Civil Procedure 56, now come Defendants, the Harrisburg School District and Timothy Curtis, by their counsel, Rhoads & Sinon LLP, and file the within Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56 for the reasons set forth in the accompanying Brief.

RHOADS & SINON LLP

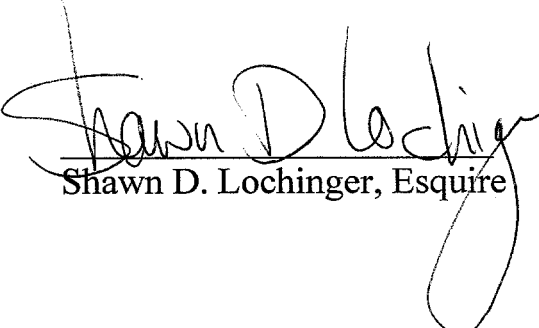
By:


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Attorneys for Defendants Harrisburg School
District and Timothy Curtis

CERTIFICATE OF CONCURRENCE

Pursuant to Local Rule 7.1, the undersigned certifies that he sought the concurrence to the Defendant Harrisburg School District's Motion for Summary Judgment from counsel for Plaintiff, Don Bailey, Esquire, and concurrence was denied, and he sought the concurrence from counsel for Defendants Robert McMurray, and AFSCME District 90, Eric M. Fink, Esquire, and concurrence was granted.

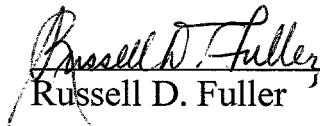

Shawn D. Lochinger, Esquire

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February, 2002, the foregoing
“Motion for Summary Judgment filed on behalf of Defendants Harrisburg School
District and Timothy Curtis” was served by means of United States mail, first
class, postage prepaid, upon the following:

Don Bailey
4311 North 6th Street
Harrisburg, PA 17110

Eric M. Fink
Willig, Williams & Davidson
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103



Russell D. Fuller